

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION
THIS DOCUMENT RELATES TO:
The OTC Action

No. 1:11-md-2262-NRB

**OTC PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT WITH DEFENDANTS MUFG BANK, LTD., THE
NORINCHUKIN BANK, AND SOCIÉTÉ GÉNÉRALE**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on a date and at a time to be determined by the Court, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, OTC Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order: (i) granting preliminary approval of the proposed settlement ("Settlement") reached between OTC Plaintiffs and Defendants MUFG Bank, Ltd. ("MUFG"), The Norinchukin Bank ("Norinchukin"), and Société Générale ("SocGen"), in the above-captioned action; (ii) certifying the proposed Settlement Class; (iii) appointing Hausfeld LLP and Susman Godfrey L.L.P. as Settlement Class Counsel, and (iv) granting preliminary approval of the proposed Plan of Distribution in connection with the Settlement.

Submitted in support of OTC Plaintiffs' Motion for Preliminary Approval of Settlement with MUFG, Norinchukin, and SocGen are: (i) the Memorandum of Law in Support of OTC Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants MUFG, Norinchukin, and SocGen; (ii) the Declaration of Seth Ard in Support of OTC Plaintiffs' Motion

for Preliminary Approval of Settlement with Defendants MUFG, Norinchukin, and SocGen and the exhibits attached to that declaration; and (iii) the [Proposed] Order Preliminarily Approving Settlement.

Dated: May 19, 2023

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